

**UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>JOHNNY M. HUNT,</b>	)	
	)	
<i>Plaintiff,</i>	)	
	)	<b>No. 3:23-cv-00243</b>
<b>v.</b>	)	
	)	<b>JUDGE CAMPBELL</b>
<b>SOUTHERN BAPTIST CONVENTION;</b>	)	<b>MAGISTRATE JUDGE</b>
<b>GUIDEPOST SOLUTIONS LLC; and</b>	)	<b>FRENSLEY</b>
<b>EXECUTIVE COMMITTEE OF THE</b>	)	
<b>SOUTHERN BAPTIST CONVENTION,</b>	)	<b>JURY DEMAND</b>
	)	
<i>Defendants.</i>	)	

**RESPONSE OF THE EXECUTIVE COMMITTEE OF THE SOUTHERN BAPTIST  
CONVENTION TO THE COURT'S MARCH 31, 2025 ORDER (DOC. 315)**

On March 31, 2025, the Court entered an Order regarding the parties' motions for leave to file under seal certain exhibits in connection with their summary judgment filings. To facilitate the Court's review, it directed each party to file a list or chart with respect to the documents it sought to seal and providing specified information concerning each document. Below is chart submitted by the Executive Committee of the Southern Baptist Convention with respect to its motion for leave to file under seal (Doc. 225):

<u>Document Description</u>	<u>Dkt No.</u>	<u>Redacted Version Filed</u>	<u>Party or Non-Party Designating as Confidential</u>
<b>I. Documents Containing Identifying Information of Doe</b>			
Redaction of Jane Doe's name from the 30(b)(6) deposition	226-1	Yes (Doc. 222-4)	N/A

transcript of Guidepost  
Solutions: page 148, line 11.

Redaction of Jane Doe's name from the deposition transcript of Samantha Kilpatrick: page 96, line 1; page 96, line 13; page 97, line 6; page 97, line 11; page 97, line 20; page 303, line 2; and page 303; line 13.	226-2	Yes (Doc. 222-5)	N/A
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Redaction of Jane Doe's name from the deposition transcript of Bart Barber: page 104, line 16 and page 104, line 25.	226-3	Yes (Doc. 222- 10)	N/A
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## **II. Documents Filed Under Seal for Other Reasons**

Redaction from the deposition transcript of Samantha Kilpatrick	226-2	Yes (Doc. 222-5). The redacted portion is page 124, line 9.	Guidepost  This redaction has not been the subject of a prior order to seal.
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Redaction of excerpts from 30(b)(6) deposition transcript of Johnny Hunt Ministries	226-4	Yes (Doc. 222- 11). The redacted portions are page 31, lines 11 through 23 and page 33, lines 12 through 16.	Plaintiff / Johnny Hunt Ministries  This redaction has not been the subject of a prior order to seal.
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Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and complete copy of the foregoing has been served through the Court's electronic filing system to the following on April 25, 2025:

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